

AA 2



November 3, 1988

Mr. Jeffrey Villnow; FITM
ECOLOGY & ENVIRONMENT, INC.
101 Yesler Way
Seattle, WA 98104

Dear Mr. Villnow:

Regarding your request for information authorized under E.P.A.
contract no. 68-01-7347. (Copy of your letter of 10/28/88 attached).

- 1.) A layout of the site including process and storage areas is attached.
- 2.) All tankage and process equipment at the plant is contained with concrete floors and walls in accordance with SPCC.
- 3.) The plant treats wood poles with pentachlorophenol ("penta") and creosote (two "general" flow schematics attached). Process waste has three sources: (A) One filter press unit which is used to clean preservative solution. (B) Residue resulting from tank cleaning. (C) Residue collected from water separating tank systems.
- 4.) The plant produces treated wood poles at the rate of approximately 1,000,000 cubic feet per year consuming 300,000 pounds of penta and 50,000 gallons of creosote.

During 1986 there was no waste generated at this plant. In 1987 we generated approximately 8,000 gallons of penta waste that was shipped to Arlington, Oregon for disposal. Through the first ten months of 1988 we have generated and shipped less than 5,000 gallons of waste.

- 5.) This plant does not treat any waste. This plant does utilize waste minimization equipment (i.e. filter press; water separation systems as stated above) but does not treat nor recycle waste. Wastes generated from the penta and creosote systems are sporadic and discretionary.
- 6.) Water accumulated in the contained areas of the plant is



put into our water process condenser cooling system.

During the heavy rain season small quantities of clean, inspected water may be discharged to outside surface areas.

Surface runoff from the plant storage areas is absorbed naturally or through "french" drain systems on site.

- 7.) All process water is utilized in the plant cooling systems. Since at times there is not ample supply of process water we purchase water from the City of Arlington for cooling, boiler usage and various on site needs. During 1987 we purchased 386,000 cubic feet of water from the city.
- 8.) All waste generated at this plant has been shipped to Arlington, Oregon for disposal via various licensed carriers. We have never disposed of waste on site.

We purchased the original small wood treatment plant (approx. 15 acres) from Ted Butcher, Inc. in April, 1970. At that time they were utilizing only a thermal wood treatment process on a limited basis. We have expanded the treating capacity of this operation by approximately 300% and cover 45 acres.

- 9.) On 3/23/81 a minor spill occurred at the plant. Details of this spill, corrective and future preventative measures taken are attached (exhibit "C").

On 6/05/81 we notified the E.P.A. of a suspected hazardous waste site from a prior owner as required by the Comprehensive Environmental Response, Compensation and Liability Act of 1980. This notification is attached (exhibit "D"). This suspected area was excavated in November of 1982 and all contaminated materials were removed and transported for disposal at Arlington, Oregon (see exhibits "E" and "F").

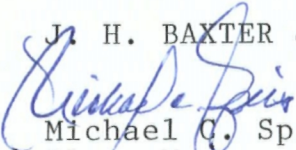
- 10.) The only complete environmental study conducted on site pertains to an adjacent woodwaste landfill. This was performed by Sweet-Edwards/Envcom of Bothell, Washington.

I hope this information will meet your needs.

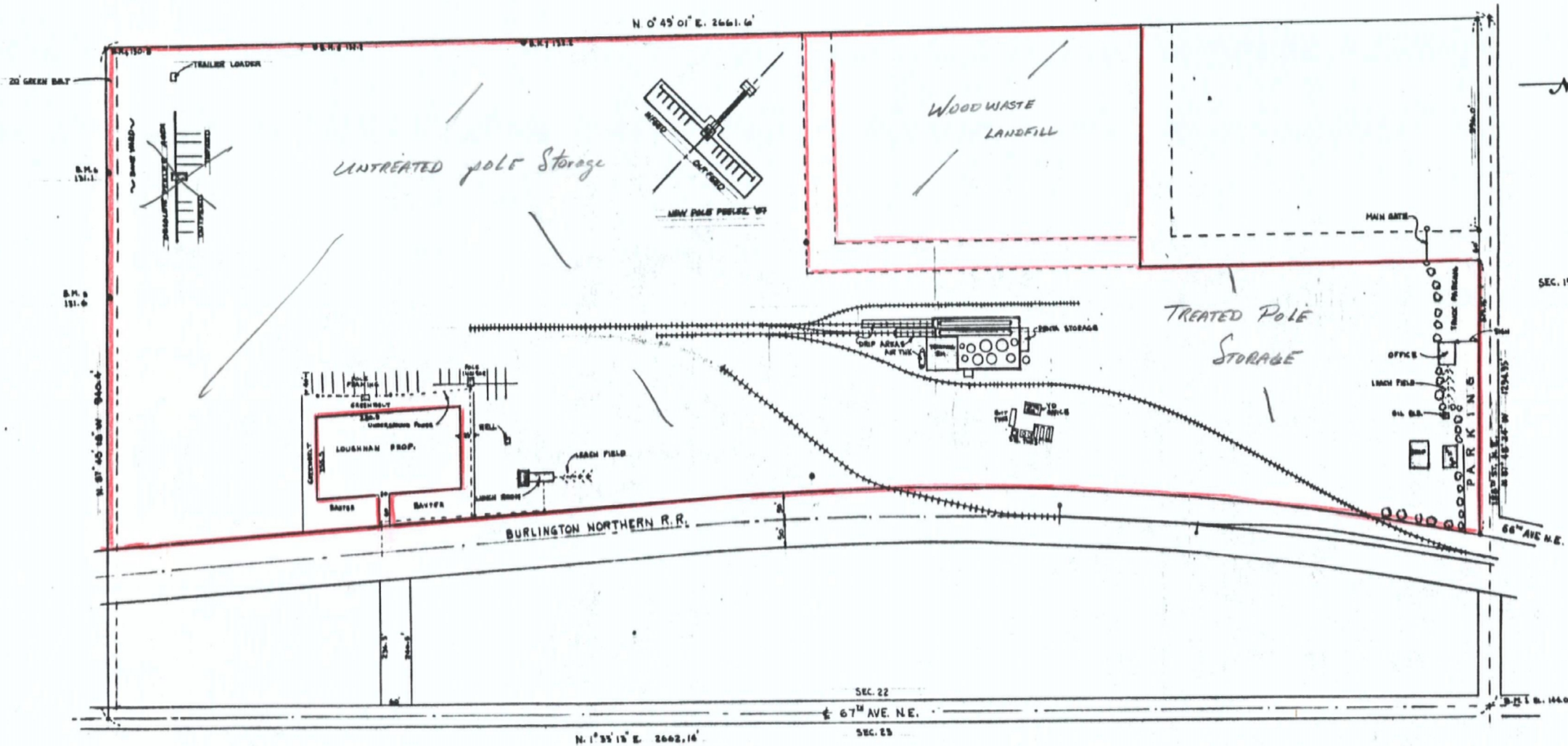
If there are further questions please contact us.

Sincerely,

J. H. BAXTER & CO.


Michael C. Spies
Plant Manager

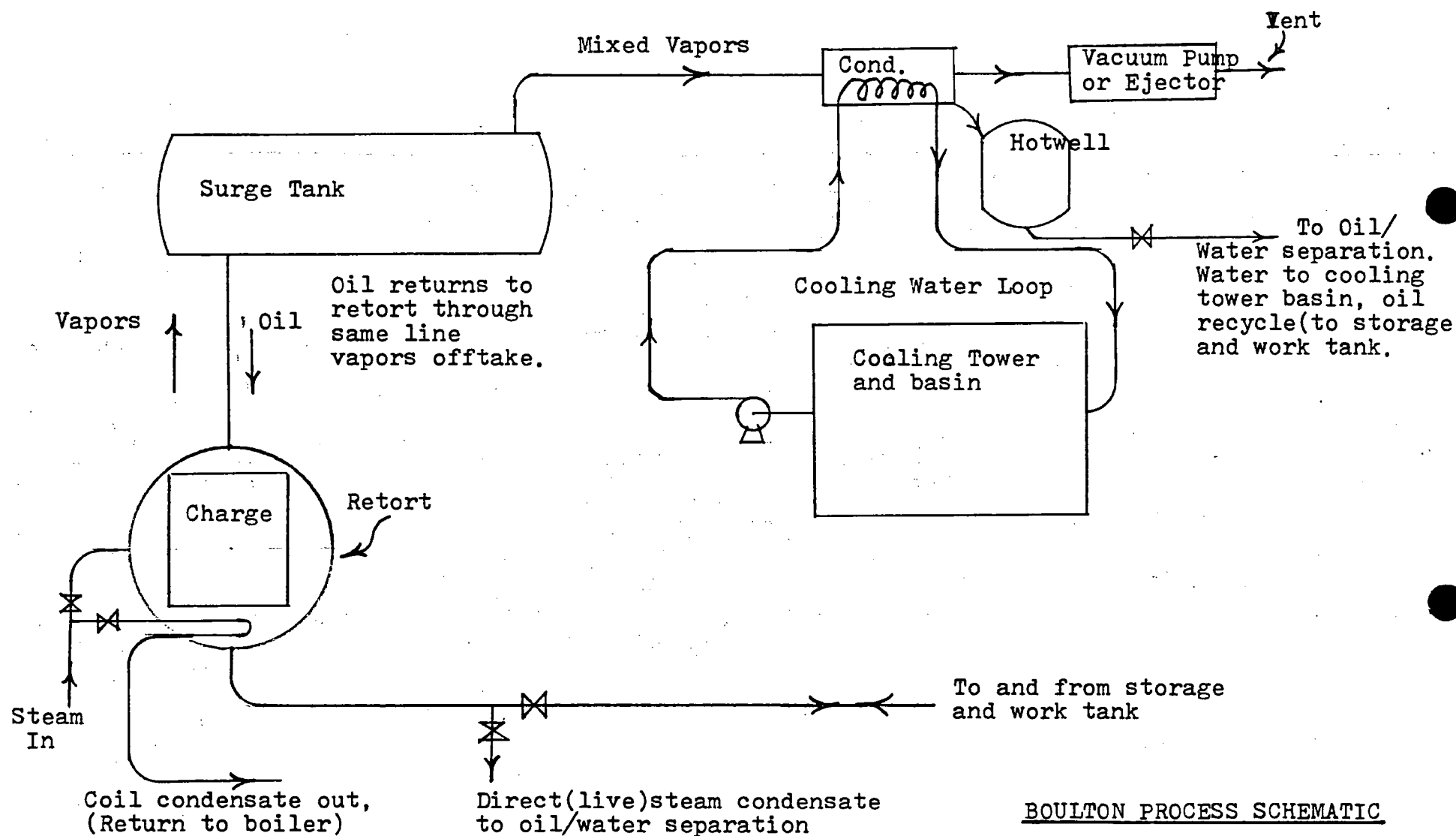
cc: W. L. Martinell, San Mateo
Joe Morgan, San Mateo
Scott Conklin, San Mateo



REVISED 8/1/84 TFL
 - ADDED NEW POLE PILES
 - COUNTRY ROAD
 - COUNTRY POLES, ARCH &
 2016 1140

Maxter 1700 SOUTH EL CAMINO REAL, SAN MATEO, CALIFORNIA	
SCALE 1" = 100'	DATE 4-30-80
DRAWN BY JACOBS	
REVISION 7-13-84	
YARD PLAN	
ARLINGTON PLANT	400D350

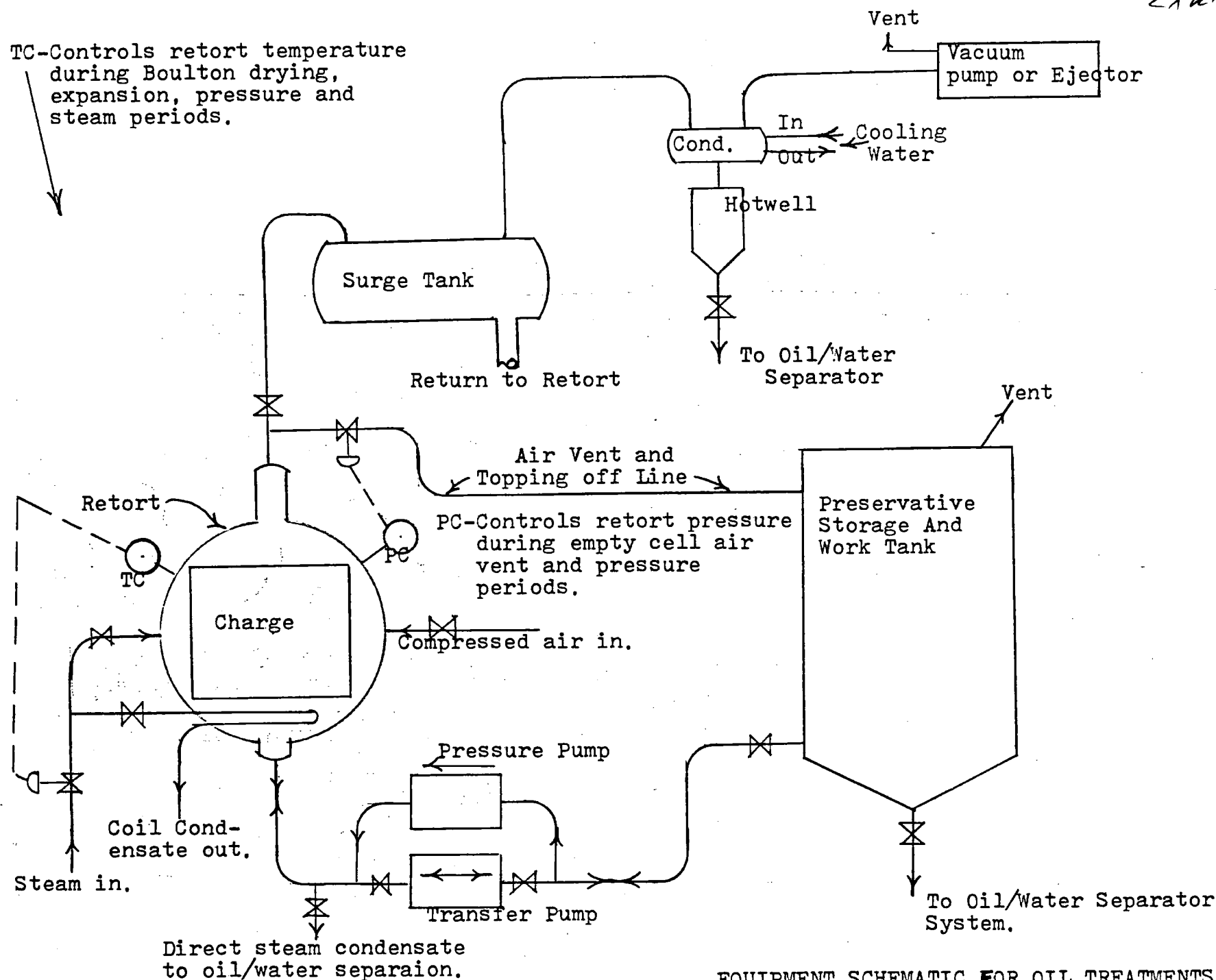
Exhibit "A"



BOULTON PROCESS SCHEMATIC
Arlington, Washington

Exhibit "B"

TC-Controls retort temperature during Boulton drying, expansion, pressure and steam periods.



EQUIPMENT SCHEMATIC FOR OIL TREATMENTS

Arlington, Washington



March 25, 1981

MEMO TO: L. G. HOPE
FROM: M. C. SPIES
SUBJECT: Accidental Pentachlorophenol Spill-Arlington Plant

At approximately 10:00pm, 3/23/81, I received a call at home from our security patrol advising a spill had occurred at the Arlington Plant. Upon my arrival at the plant at about 10:15pm I observed a spill from the butt tank covering an approximate area from the tank as follows: 30' North, 75' Northwest, 30' West, 20' South, 20' East. At that time I shut the system down and inspected the spill to confirm containment and that no probability existed for spill into a drain ditch or sump area. I left the plant at 11:15pm.

In the a.m. of 3/24/81, cleanup of the spill had begun by Baxter plant personnel using a skimmer from the Renton Plant for the liquid of which we recovered approximately 300 gallons back to the system. Contaminated soils were picked up by shovel and a backhoe loader and then transported to a drained area of the plant being placed on visqueen plastic and covered with same. These soils are being held for inspection by the State D. O. E. and then ultimate disposal which will probably be the Chem-Security Systems facility at Arlington, Oregon.

At 9:15 am on 3/24/81 I called the U. S. Coast Guard (800-424-8802) and reported the spill to Petty Officer Mackey. I advised Officer Mackey that we estimate approximately 600 lbs. in solution (1400 gallons) of pentachlorophenol had spilled and further advised the time, location, containment situation and measures in progress to clean up the spill.

At 9:30 am on 3/24/81, I called the E.P.A., Region X, Seattle office and reported the spill information to Bill Schmidt. At approximately 1:15 pm Carl Kitz of the E.P.A., Environmental Emergency Section, arrived at the plant for an onsite inspection of the spill and our method of cleanup. Mr. Kitz advised that I should contact the State Dept. of Ecology (D.O.E.).

At 2:15 pm I called the State D.O.E. and reported the spill to Stu Messman. At 4:30 pm, Dave Wright of the D.O.E. arrived at the plant for an onsite inspection and information on how the spill occurred. Mr. Wright advised that another inspector from the D. O. E. would visit us on 3/25 for a more extensive review.

Ex. 611
"C"
page 1 of 3

March 25, 1981

L. G. Hope

Accidental Pentachlorophenol Spill-Arlington Plant

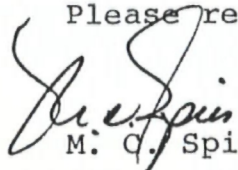
Page two

"C"
"2"
page 2 of 3

In our judgement this spill was the result of heavy rains and water from the pump room sump pump being dropped on top of the 230° circulated solution which caused a foam up and overflow of the butt tank. We have now re-routed the discharge of the sump pump to a waste storage tank as we feel this additional water source may have been a contributing factor.

Per our conversation, our current plans of containment of this facility, which were scheduled for completion this year, have been given priority for design and installation and other corrective measures are in progress.

Please review and advise.


M. C. Spies

cc: WLM
WOS

*Elizebeth
"C"
page 3 of 3*



April 23, 1981

Elizebeth Tubbs
Chem-Security Systems, Inc.
P. O. Box 1866
Bellvue, Wa 98009

Dear Miss Tubbs:

Per your request, I have attached information as backup regarding our most recent transfer of hazardous waste material from our Arlington, Washington plant to your waste disposal site at Arlington, Oregon.

There were two shipments, one on 4/14/81 via LTI with an estimated 67,340 lbs and one on 4/16 with an estimated 38,260 lbs. This material consisted of soils contaminated with penta-chlorophenol (EPA waste No. K001).

We appreciate your assistance in getting a verbal authorization from the Oregon D.E.Q. for transport in that state since the Washington D.O.E. had requested removal from our facility as soon as possible.

Sincerely,

J. H. BAXTER & CO .

Michael C. Spies
Michael C. Spies
Arlington Plant Mgr.

cc: WOS/LAH - J.H.Baxter & Co, San Mateo, Calif.
Craig S. Baker-State of Wa, D.O.E., Redmond, Wa

EPA Notification of Hazardous Waste Site

United States
Environmental Protection
Agency
Washington DC 20460

This initial notification information is required by Section 103(c) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 and must be mailed by June 9, 1981.

Please type or print in ink. If you need additional space, use separate sheets of paper. Indicate the letter of the item which applies.

Exhibit "D" page 183

Person Required to Notify:

Enter the name and address of the person or organization required to notify.

Name J. H. Baxter & Co.
Street P. O. Box 305
City Arlington State Wa. Zip Code 98233

Site Location:

Enter the common name (if known) and actual location of the site.

Name of Site J. H. Baxter & Co. - Arlington Plant
Street 6520 188th St. N.E.
City Arlington County Snohomish State Wa. Zip Code 98223

Person to Contact:

Enter the name, title (if applicable), and business telephone number of the person to contact regarding information submitted on this form.

Name (Last, First and Title) Spies, Michael, Plant Manager
Phone (206) 435-2146

Dates of Waste Handling:

Enter the years that you estimate waste treatment, storage, or disposal began and ended at the site.

From (Year) (est) 1960 To (Year) 1970

Waste Type: Choose the option you prefer to complete

Option 1: Select general waste types and source categories. If you do not know the general waste types or sources, you are encouraged to describe the site in Item I—Description of Site.

General Type of Waste:
Place an X in the appropriate boxes. The categories listed overlap. Check each applicable category.

Source of Waste:
Place an X in the appropriate boxes.

1. ☐ Organics
2. ☐ Inorganics
3. ☐ Solvents
4. ☐ Pesticides
5. ☐ Heavy metals
6. ☐ Acids
7. ☐ Bases
8. ☐ PCBs
9. ☐ Mixed Municipal Waste
10. ☐ Unknown
11. ☐ Other (Specify)

1. ☐ Mining
2. ☐ Construction
3. ☐ Textiles
4. ☐ Fertilizer
5. ☐ Paper/Printing
6. ☐ Leather Tanning
7. ☐ Iron/Steel Foundry
8. ☐ Chemical, General
9. ☐ Plating/Polishing
10. ☐ Military/Ammunition
11. ☐ Electrical Conductors
12. ☐ Transformers
13. ☐ Utility Companies
14. ☐ Sanitary/Refuse
15. ☐ Photofinish
16. ☐ Lab/Hospital
17. ☐ Unknown
18. ☐ Other (Specify)

Option 2: This option is available to persons familiar with the Resource Conservation and Recovery Act (RCRA) Section 3001 regulations (40 CFR Part 261).

Specific Type of Waste:
EPA has assigned a four-digit number to each hazardous waste listed in the regulations under Section 3001 of RCRA. Enter the appropriate four-digit number in the boxes provided. A copy of the list of hazardous wastes and codes can be obtained by contacting the EPA Region serving the State in which the site is located.

U051
U242

Notification of Hazardous Waste Site

Side Two

Waste Quantity

Place an X in the appropriate boxes to indicate the facility types found at the site.

In the "total facility waste amount" space give the estimated combined quantity (volume) of hazardous wastes at the site using cubic feet or gallons.

In the "total facility area" space, give the estimated area size which the facilities occupy using square feet or acres.

Facility Type

1. ☐ Piles
2. ☐ Land Treatment
3. ☐ Landfill
4. ☐ Tanks
5. ☐ Impoundment
6. ☐ Underground Injection
7. ☐ Drums, Above Ground
8. ☐ Drums, Below Ground
9. ☒ Other (Specify) _____

Total Facility Waste Amount

cubic feet

gallons

Total Facility Area

square feet 400

acres

Exhibit "D"
page 2 of 3

Known, Suspected or Likely Releases to the Environment:

Place an X in the appropriate boxes to indicate any known, suspected, or likely releases of wastes to the environment.

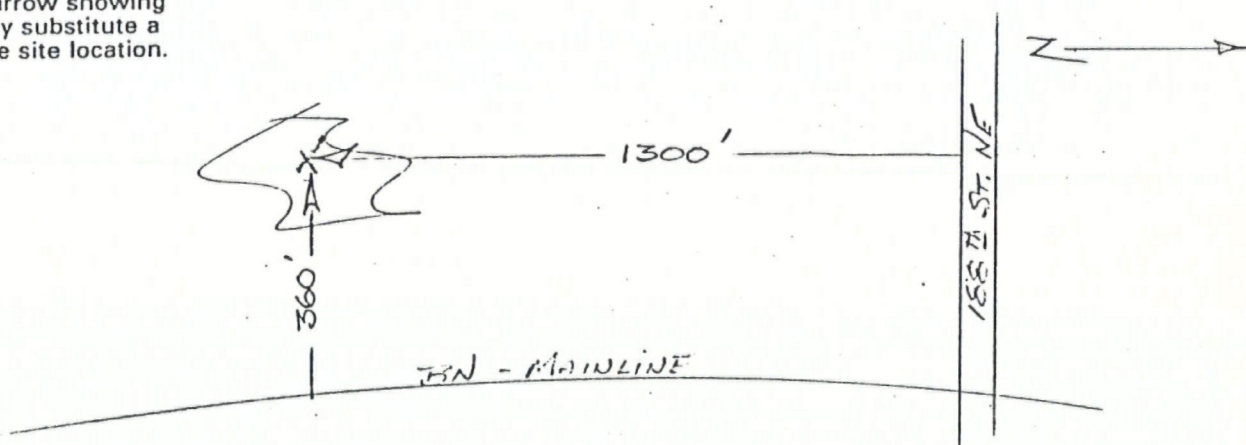
☐ Known ☐ Suspected ☐ Likely ☐ None

Note: Items H and I are optional. Completing these items will assist EPA and State and local governments in locating and assessing hazardous waste sites. Although completing the items is not required, you are encouraged to do so.

Sketch Map of Site Location: (Optional)

Sketch a map showing streets, highways, routes or other prominent landmarks near the site. Place an X on the map to indicate the site location. Draw an arrow showing the direction north. You may substitute a publishing map showing the site location.

Also see attached



Description of Site: (Optional)

Describe the history and present conditions of the site. Give directions to the site and describe any nearby wells, springs, lakes, or housing. Include such information as how waste was disposed and where the waste came from. Provide any other information or comments which may help describe the site conditions.

The prior owners, Ted Butcher, Inc., reportedly had used an area of about 20' x 20' for waste storage which would contain some cresote & penta petroleum. This area has been filled in and it is felt that the waste is stabilized and presents no problem to the environment.

Signature and Title:

The person or authorized representative (such as plant managers, superintendents, trustees or attorneys) of persons required to notify must sign the form and provide a mailing address (if different than address in item A). For other persons providing notification, the signature is optional. Check the boxes which best describe the relationship to the site of the person required to notify. If you are not required

Name Michael C. Spies, Plant Mgr.

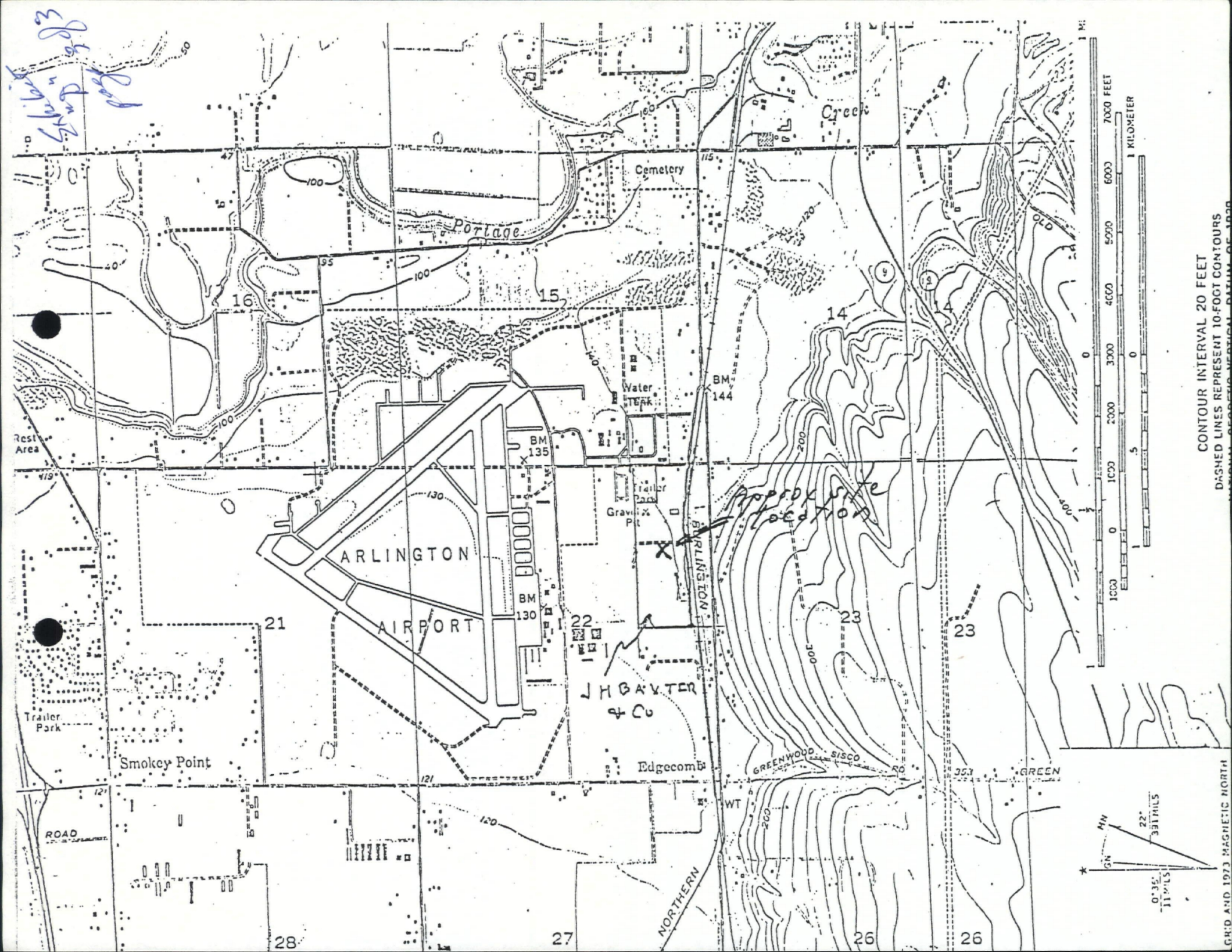
Street P. O. Box 305

City Arlington State Wa. Zip Code 98223

Signature Michael C. Spies

Date 6-5-81

- ☐ Owner, Present
☐ Owner, Past
☐ Transporter
☒ Operator, Present
☐ Operator, Past
☐ Other



CONTOUR INTERVAL 20 FEET
DASHED LINES REPRESENT 10-FOOT CONTOURS
DASHED LINES REPRESENT 10-FOOT CONTOURS
DASHED LINES REPRESENT 10-FOOT CONTOURS

GRID AND 1973 MAGNETIC NORTH



CSSI

CHEM-SECURITY SYSTEMS, INC.

INVOICE NO. 34740

BILLING LOCATIONS:

☐ CHEMICAL OPERATIONS
STAR ROUTE
ARLINGTON, OR 97812
(503) 454-2777

☐*Exhibits
u E*S
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D
T
O

J.H. Baxter & Co.

P.O. Box 305

Arlington, WA

98223

ATTN:

CUSTOMER #	5	DATE	6	P.O. #	7	STATE CODE	8	DIVISION	9
10*100421		11-30-82		NONE		OR		870	
F.O.B.	10	PROJECT #	11	ACCOUNT DIST.	12	SHIP VIA	13		
		38851				SEA		CSSI	

DESCRIPTION

AMOUNT

Disposal of 35118 ~~CONTAMINATED~~ WITH pentachlorophenol at our
Arlington, Oregon disposal site as follows:

<u>Drams</u>	<u>Date</u>	<u>Log No.</u>	<u>Manifest No.</u>
35,110	11-23-82	16819	49488
35,110lbs. @r 17.555 ton @ \$68.00/ton			
Transportation Charge			
Excess loading: 3/4 Hour @ \$50.00/hour			

\$ 1,193.74
1,155.00
37.50
\$ 2,386.24

15

TERMS: NET 30 DAYS, INVOICES NOT PAID WITHIN 30 DAYS ARE SUBJECT TO CHARGE OF 1% PER MONTH.
PLEASE MAKE ALL CHECKS PAYABLE TO:

14 CHEM-SECURITY SYSTEMS, INC.
P.O. BOX 5022
BELLEVUE, WA 98009

CHEM-SECURITY SYSTEMS, INC.
P.O. BOX C 21010

DUPLICATE COPY



CHEM-SECURITY SYSTEMS, INC.

INVOICE NO. 34813

BILLING LOCATIONS:

2 ☒ CHEMICAL OPERATIONS
STAR ROUTE
ARLINGTON, OR 97812
(503) 454-2777

3 ☐

*Exhibit
u F*

4 **S
O
L
D
T
O**
J.H. Baxter
P.O. Box 305
Arlington, WA 98223

ATTN: Mike Spies

1 CUSTOMER # 10-100421	5 DATE 12-9-82	6 P.O. # None	7 STATE CODE OR	8 DIVISION 870	9
10 F.O.B. 38851	11 PROJECT # 38851	12 ACCOUNT DIST. SEA	13 SHIP VIA CSSI	13	

DESCRIPTION				AMOUNT
Disposal of soil contaminated with pentachlorophenol at our Arlington, Oregon disposal site as follows:				15
<u>Lbs.</u>	<u>Date</u>	<u>Log No.</u>	<u>Manifest No.</u>	
44,720	12-3-82	17037	40911	
44,720 lbs. or 22.36 ton @ \$68/ton				\$ 1,520.48
Transportation charges				1,155.00
Excess loading charges: 1 hour @ \$50/hour				50.00
				<u>\$ 2,725.48</u>

12-15-82
MS *llw*
MS 4723
BS 45 55

TERMS: NET 30 DAYS, INVOICES NOT PAID WITHIN 30 DAYS ARE SUBJECT TO CHARGE OF 1% PER MONTH.
PLEASE MAKE ALL CHECKS PAYABLE TO:

14 CHEM-SECURITY SYSTEMS, INC.
P.O. BOX 5022
BELLEVUE, WA 98009

CHEM-SECURITY SYSTEMS, INC.
P.O. BOX C 34910
SEATTLE, WA 98124

DUPLICATE COPY



ecology and environment, inc.

101 YESLER WAY, SEATTLE, WASHINGTON, 98104, TEL. 206/624-9537

International Specialists in the Environment

October 28, 1988

Mr. Mike Spies, Plant Manager
J.H. Baxter & Company, Inc.
6520 188th Street N.E.
Arlington, Washington 98223

Dear Mr. Spies:

As discussed in your conversation with Lynn Guilford of our office on October 28, 1988, this letter is a request for information regarding J.H. Baxter, located at 6520 188th Street N.E., Arlington, Washington.

J.H. Baxter & Company, Inc. has been identified by the United States Environmental Protection Agency (EPA) Region X as requiring additional information to accurately profile the nature and extent of past waste disposal activity at the site.

The EPA has been given authority under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) of 1980, as amended by the Superfund Amendments and Reauthorization Act (SARA) of 1986 (42 U.S.C. § 6901 et seq.; Sec. 104), to gain access to sites where hazardous substances may have been generated, stored, treated, disposed, or transported. Ecology and Environment, Inc. (E&E) is an authorized contractor of EPA (Contract No. 68-01-7347) (CERCLA; Sec. 115) and is acting on their behalf as field investigators.

A site assessment is performed to determine the impact or potential impact on the environment of any hazardous substances which may exist in an uncontrolled manner at your facility. Information gathered is subsequently summarized in a report which will be available from EPA. The report provides a basis for determining if any further action is required at the site.

Your company may assert a claim of confidentiality for any information entitled to protection under 40 CFR, Part 2, Subpart B by designating data you believe is entitled to such protection and submitting that data separately.

The information required at the present time to complete the assessment is listed below:

- / o A layout of the site including: process areas, raw materials storage areas, waste storage areas, treated wood storage areas, the woodwaste landfill, and any other major features of your facility.
- ✓ o A description of containment systems used at the facility.

Handwritten:
10/31/88
2x'2 to JM
10/31

Mr. Mike Spies
J.H. Baxter & Company, Inc.
Page 2

- o3 A process description with process flow diagrams for all wood treating processes and supporting processes, indicating sources of waste streams.
- o4 Characteristics and annual quantities of raw materials, final products, and wastes, including hazardous materials, if generated at the site.
- o5 Descriptions of waste treatment systems and quantitative data on waste generated from various processes. *? How far back*
- o6 Collection and treatment methods used for surface runoff and water accumulated in bermed areas. If possible, specify runoff quantities.
- o7 Water supply source for the facility, including volumes of process and sanitary water used.
- o8 Records on waste quantities, disposal, and shipment methods both past and present. Information on waste disposed of on-site in the past.
- o9 Records on spills including material types, quantities, and remedial actions. Analytical results for soil and groundwater samples collected in conjunction with any removals.
- o10 Information on environmental studies conducted at the site.

I would appreciate it if you could provide the requested information by November 11, 1988. If you have any questions regarding this request, please contact Lynn Guilford or me at (206) 624-9537. Please contact Deborah Flood, USEPA, at (206) 442-2722 if you have additional questions regarding the purpose of this assessment.

Sincerely yours,

 AFITOM

Mr. Jeffrey Villnow
Field Investigation Team Manager

JV:rls

Enclosures

CC: Deborah Flood, HWD-SM, USEPA, Region X
John Osborn, ESD-PO, USEPA, Region X
Lynn Guilford, E&E, Seattle